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IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF OKLAHOMA

Richard Glossip, et al.,
PLAINTIFFS,

VS.

Randy Chandler, et al.,
DEFENDANTS,

WADE LAY, PLAINTIFF AS DEFIANT.

CASE NO. CV-14-665-F

FILED

APR 23 2021

CARMELITA REEDER SHINN, CLERK
U.S. DIST. COURT, WESTERN DIST. OKLA.
BY all DEPUTY

PLAINTIFF (WADE LAY) MOTION FOR DISCLOSURE
PURSUANT TO FED. R. CIV. P. RULE 26(a)(3) &
(4); AND RULE 26(b)(1) & (3) (WITH BRIEF IN SUPPORT)

COME NOW (WADE LAY) TO MOTION THIS COURT TO
ORDER OKLAHOMA DEPT. OF CORRECTIONS TO PROVIDE
DOCUMENTS "RELEVANT TO ANY PARTY'S CLAIM... PROPORT-

DATE:

PRO-32

WADE CREECH LAY #51223

OKLAHOMA STATE DEPARTMENT

P.O. BOX 97

MCKESSER, OKLA. 74502

"CONAL TO THE NEEDS OF THE CASE, considering the importance of the issues at stake in the action".

(EMPHASIS ADDED),

THE UNITED STATES SUPREME COURT HAS DECLARED, THAT: "DEATH IS DIFFERENT", THAT ANY DEATH PENALTY CASE DESERVES PREFERENCE, WITH A DISPOSITION TOWARDS ACCOMMODATION. ESPECIALLY WHEN A PERSON IS ACTING PRO-SE AS A PRISONER. THE OKLAHOMA DEPT. OF CORRECTIONS DOES THE OPPOSITE, EVEN REFUSING TO PROVIDE INFORMATION AND/OR REMEDIAL ASSISTANCE WHEN PRISON OFFICIALS VIOLATE A PRISONER'S RIGHTS, THAT IS REQUIRED OF THEM BY LAW AND O.D.O.C. POLICY REGULATIONS.

ONE EXAMPLE IS EASILY DISPLAYED. IN EXHIBIT

1160-A, A REQUEST TO STAFF^(R.T.S.) DATED 03/15/2021, R.T.S. NO.

21-1304, WADE LAY MAKES A REQUEST FOR INFORMATION AND DOCUMENTS STATE LAW ONLY. STAT. tit. 57, § 549(A)(B) MAKES REQUISITE TO DEDUCT AND TRANSFER TRUST FUND DOLLARS FROM A PRISONER'S TRUST FUND ACCOUNTS.

THE PLAINTIFF HAD IN THE PAST, AS INDICATED IN THE SUBJECT PORTION OF THE R.T.S., SENT NUMEROUS R.T.S. TO VARIOUS DEPARTMENT HEADS, AND WAS EVEN INSTRUCTED BY LEON WILSON (O.D.A.C. COMPTROLLER) TO SUBMIT A R.T.S. TO O.S.P. OFFICIALS FOR SUCH DOCUMENTS AS THAT REQUESTED IN THE R.T.S. NO. 21-1304. (SEE EXH. 1160-A). THE PLAINTIFF WRITES: "THIS IS THE 7TH REQUEST TO STAFF FOR THIS INFORMATION". IF THE COURT WILL VIEW THE ACTION OF N. BATTLES (STAFF MEMBER, (WARDEN'S ASST.))

EXH. #

1) SEE EXHIBIT 1160-C, R.T.S. TO MR. SHARP IN REQUEST OF 2019,

MISS BATTLES MISAPPROPRIATES THE RULE, O.D.O.C.

OP-090124 STATUTE: "B.I.S. MUST BE SUBMITTED 7

DAYS OF INCIDENT. THIS IS BEING RETURNED FOR

NOT FOLLOWING OP-090124."

IN THE ACTION REQUESTED PORTION THE COURT WILL

SEE THE LOGICAL AND RELEVANT REQUEST FOR THE

O.S.P. FACILITY HEAD TO: "PROVIDE THE DOCUMENTS,

OR DECLARE THE ABSENCE OF THOSE NECESSARY

DOCUMENTS." WHAT IS CRITICAL TO NOTE, IS THAT

(O.I.G.),
THE OKLA. INSPECTOR GENERAL HAD VISITED

WADE LAY AT O.S.P. ON FEBRUARY 23, 2021, AND

WADE LAY HAD WRITTEN THE OKLA. DEPT. OF CORRECT-

IONS DIR. SCOTT CROW ABOUT THE O.I.G. VISIT,

AND SO BOTH THE DIRECTOR AND THE O.I.G. WERE

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ACTIVELY INVESTIGATING THE SUBJECT MATTER OF
THE R.T.S. NO. 21-1304, AND MISS BATTLES WAS
PRIVY TO THIS FACT.

IF THE COURT WILL VIEW EXHIBIT 1160-B, JUDGE
PRIOT WILL SEE A LETTER DATED 03/05/2021^f
FROM NICOLE FLEMING (APPOINTED BY SCOTT CROW)

THAT INSTRUCTS WADE LAY TO SUBMIT A R.T.S.

FORM TO ADDRESS THE SAME ISSUE THAT HAD BEEN
ADDRESSED OVER (7) SEVEN TIMES SINCE SEPT.

14, 2018 WHEN \$72.96 WAS REMOVED FROM LAY'S

MANDATORY SAVINGS AND SENT TO THE U.S.D.C.

W.D./OK. (SEE Lay V. U.S.D.C. NO. 20-1038 OPENING

BRIEF DOC. NO. 010110372594, AT PG^s 4-6).

MISS BATTLES AND MISS FLEMING WERE BOTH AWARE

F.H.
\$) WADE LAY RECEIVES THE ON THE 9th OF MARCH 2021, 6 DAYS
PRIOR TO MARCH 15, 2021, THE DATE OF THE R.T.S. NO. 21-1304.

OF THE O.I.C. INVESTIGATION, OF THE CURRENT
PROCLIVITY OF THE ISSUE, YET THEY CONSPIRE
TO PREVENT DISCLOSURE, EVEN IN A SETTING ^{WHERE} O.D.O.C.
POLICY REQUIRES THEY ACCOMMODATE THE REQUEST.
ADDITIONALLY, WHEN PRISON OFFICIALS VIOLATE
A PRISONER'S CONSTITUTIONAL RIGHTS IN AN ACTION
THAT ALSO VIOLATES STATE LAW, AND THE ACT IS
DONE IN SECRET, OR TO SAY, OUTSIDE THE PRISONER'S
ABILITY TO KNOW ABOUT THE ACT UNTIL HE SEES
THE ADVERSE EFFECTS OF IT, THE MATTER IS
NOT TIME BARRED BY PRISON GUIDELINES; AND
MORE IMPORTANTLY, WHEN IT IS CLEAR, THAT PRISON
OFFICIALS AND D.O.C. OFFICIALS MANIPULATE THEIR OWN
RULES TO DESTROY CONSTITUTIONAL RIGHTS CONTRARY

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TO STATE LAW, KNOWING THEY ARE VIOLATING ESSENTIAL
CONSTITUTIONAL RIGHTS, AND THE LAWS OF THE U.S. AND
THE STATE OF OKLA., SOVEREIGN IMMUNITY IS NOT
APPLICABLE AND THE STATE ACTORS ARE LIABLE.

MISS BATTLES KNOWS THE R.T.S. NO. 21-1304 IS NOT
TIME BARRED, AND THE DIRECTOR SCOTT CROW KNOWS
FROM MULTIPLE SOURCES, THAT HIS SUBORDINATES
PURPOSELY SUPPRESS MERITORIOUS COMPLAINTS BY
PRISONERS AND THEIR FAMILIES CONCERNING GRAVE
ISSUES OF MISCONDUCT BY PRISON OFFICIALS. WHAT IS
RELEVANT TO THIS CASE, IS THAT, THIS UNBRIDLED ATTITUDE
OF RETALIATION, WHERE DEPRIVATION OF RIGHTS AND BRUTAL
ABUSE IS THE MEANS OF RETALIATION, THE CODES OF
LAWS DEEMED AS THE PROPER PRACTICE OF AN ACTION HAS PROVEN

TO BE WADEQUATE.

THE ABUSES AND PREJUDICE IN WADE LAY'S SITUATION
ALONE SHOWS TO THIS COURT, AND SHOULD BE SHOWN TO
THE PUBLIC THROUGH MEANS OF TRIAL, THE SYSTEMIC
FAILURE AND CONTAMINATE OF CORRUPTION MUST FIRST BE
DEALT WITH BEFORE NEW PROTOCOLS CAN HAVE ANY
AFFECT. JIM CROW AND PEONAGE SHOULD SERVE AS
ADEQUATE EXAMPLES TO THE COURTS OF THE UNITED
STATES. THERE EXIST AN ABUNDANCE OF MATERIAL
ESTABLISHED AS PRECEDENT TO CONVEY THE CONCEPT OF
EQUAL PROTECTION OF THE LAWS. HOWEVER, DEFEATFUL
AND IMMORAL CORRECTIONS OFFICIALS SIMPLY DECLARE
THAT A RULE IS BEING UPHOLD, AND THE CLAIM MADE BY
THE PRISONER IS INACCURATE, IN OTHER WORDS, THE E.D.C.

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BELIEVES THAT A FALSE STATEMENT, ~~IS~~, A SIMPLE LIE CAN
OVERCOME FACT. THIS IS WHY THE PRESS RELEASE BY
MR. SCOTT CROW TO THE PUBLIC, BEFORE, AND IN PARTICULAR
AFTER AN EXECUTION, IS A MEANS OF DECEPTION RELIED
UPON TO AVOID ACCOUNTABILITY.

THE CONTAMINATE OF CORRUPTION IS A MATTER OF CURRENT
SIGNIFICANCE WHEN MODES OF PROCEEDING OR CODES
OF LAW DICTATING THE PROCESS IS RELIED UPON TO RESOLVE
SUCH A CONSTITUTIONAL RIGHT AS THAT PROTECTED UNDER
THE EIGHTH AMENDMENT. ESPECIALLY WHEN THOSE
PROTOCOLS ARE COVERING THE TERMINATION OF A HUMAN
LIFE.

WADE LAY KNOWS FROM HIS OWN OBSERVATIONS, THAT THE
LOCKET AFFAIR IN 2014, IS A MATTER CAUSED BY THIS

SAME CONCERN. A DISPOSITION OR ATTITUDE THAT PERMEATES THE O.D.C., AND IS NOT A DEMEANOR THAT CAN BE ERADICATED THROUGH MEANS OF - A CHANGE OF LEADERSHIP. THE CONTAMINATION IS INTRINSIC, IT IS IDENTICAL TO THE PROBLEM OF RACISM, THE EMPLOYEES AT THE O.D.C. DO NOT BELIEVE LYING TO THE PEOPLE, THE PRESS, OR THIS COURT IS WRONG, BECAUSE, THEY DO NOT BELIEVE PRISONERS ARE ENTITLED TO THE PROTECTION OF LAW. A QUICK EXAMPLE CAN BE GIVEN: STATE LAW, U.S. LAW, O.D.C. POLICY AND COMMON LAW PRECEDENT MANDATES CERTAIN RIGHTS AS FUNDAMENTAL, SUCH AS: THE RIGHT TO HEAT IN WINTER, SHOWERS (3) THREE TIMES A WEEK, AND A PARTICULAR STANDARD OF NUTRITION. ALL OF THESE RIGHTS ARE REGULARLY VIOLATED AT O.S.P. THEY

SIMPLY LIVE ABOUT IT !

AS THE PLAINTIFF WRITES THIS PLEADING, ON 03/28/2021,
SUNDAY, HE HAS NOT SHOWERED SINCE LAST THURSDAY
BECAUSE SHOWERS SCHEDULED FOR SATURDAY, 03/27/2021
WERE SIMPLY IGNORED BY O.S.P., A REGULAR OCCURRENCE.

O.S.P. CANNOT FULFILL THE OBLIGATIONS OF THE INSTITU-
TIONAL PROTOCOLS ESTABLISHED BY THE O.D.O.C. WHICH
BEGAN EARLY IN 2010, DUE TO DECREASING BUDGETS AS A
RESULT OF THE 2008 FINANCIAL CRISIS.

IT IS IN FACT, THAT PARTICULAR ISSUE WHICH IS DETAILLED
IN WADE LAY V. DAVID ORMAN, CIV-15-170-FHS-SPS, AND TO THE
TENTH CIRCUIT IN LAY V. O.D.O.C., NO. 20-6098; THAT HAS BROUGHT
ABOUT THE MOST SEVERE ACTS OF ABUSE BY THE
O.D.O.C. TOWARDS WADE LAY.

THE O.D.O.C. HAS LIED TO THE PEOPLE OF THIS STATE FOR (11) ELEVEN YEARS. MILLIONS OF DOLLARS EACH YEAR IS MISDIRECTED TO MORE THAN JUST UNNECESSARY PROTOCOLS, BUT TO LUDICROUS REQUIREMENTS THAT SERVE NO PURPOSE, ALL UNDER PRETENSE OF SECURITY. A UNIT, THIS BUILDING, AT GREAT EXPENSE IN 1989 WAS SOLD TO THE PUBLIC UNDER THE SUPPOSITION, IT WOULD BE SO COST EFFICIENT TO RUN. THE PLAINTIFF DID RESEARCH FOR A STATE SENATOR AT THE TIME OF PUBLIC DEBATE SURROUNDED THE ISSUE. THE TRUTH IS, THE O.D.O.C. WAS CREATED, TOTALLY DYSFUNCTIONAL PROTOCOLS AND MODES OF PROCEEDING, TO REQUIRE EXCESSIVE NUMBERS OF SECURITY OFFICERS TO ACCOMPLISH THOSE UNNECESSARY PROTOCOLS. THIS UNDERLYING CORRUPTION BREEDS AN UNMEASURABLE LEVEL OF CONTEMPT

FOR HUMANITY, AS IT IS PRISONERS ARE VIEWED AS
ANIMALS BEING MOVED TO AND FROM PODS OF INHUMAN
ISOLATION.

THIS COURT MUST RECOGNIZE AND ALLOW FOR DISCOVERY, INTO
THE UILE CONDITIONS CREATED BY THE C.D.O.C. FOR
THE SINGULAR PURPOSE OF ACQUIRING EXCESSIVE AND
UNWARRANTED APPROPRIATIONS FROM THE STATE LEGISLATURE.

IT IS ALSO CRITICAL TO UNDERSTAND, THAT AFTER (11) ELEVEN
YEARS OF THIS CORRUPT STATE, THE ADMINISTRATIVE CORPS
OF THE ENTIRE DEPARTMENT (STATE-WIDE) HAS BECOME A
DEPRAVED FRATERNITY. SUCH A BODY CANNOT BE ENTRUSTED
WITH THE SACRED TASK THAT HAS BEEN DELAYED NOW
FOR SEVEN YEARS. THE FACTS WILL SHOW, THAT
MR. SCOTT CROWN IS AN OLD-SCHOOL GRADUATE OF THAT

WAY OF THINKING.

THE PLAINTIFF UNDERSTANDS THAT EXECUTION PROTOCOLS
IS THE PRIMARY ISSUE OF THIS CASE; BUT THIS COURT MUST
COMPREHEND, RULES OR CODES OF ETHICS DO NOT ALTER THE
BEHAVIOUR OF THOSE INDIVIDUALS (ESPECIALLY WITHIN GOVERNMENT
BUREAUCRATIC CIRCLES) WHOM PRACTICE LAWLESSNESS THROUGH
MEANS OF DECEIT. THE UNRULY BEHAVIOUR OF O.S.P. IS
A DISPOSITION PERPETUATED BY DESIGN, THE DISOBEDIENT
NATURE OF PRISON OFFICIALS SUCH AS: KIEITH SHERWOOD;
JERRY PERRY; AND PATILIE COOPER, REMAINS WITHIN
THE CHARACTERS: MR. FARLIS (WARDEN AT O.S.P. PRESENTLY);
MARGUERET GREEN (DEPUTY WARDEN AT O.S.P. PRESENTLY);
AND MR. KIRBY (HONIT WGR. AT O.S.P. PRESENTLY).
IT IS ESSENTIAL TO PLAINTIFF INADE QUAY'S ABILITY TO

ENTER THE PROTECTION OF THE EIGHTH AMENDMENT,
THAT THIS INFORMATION BE MADE AVAILABLE FOR
TRIAL, AND THEREFORE, ABLE TO SEND TO THE
OTHER PARTIES. PLEASE RESPOND QUICKLY!



3-30-21

03/30/2021

RESPECTFULLY SUBMITTED
MADE LAY AT O.S.P.

P.O. BOX 97

MCALISTER, OKLA. 74602